

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

PRIMARY PRODUCTIONS LLC,)
)
Plaintiff,)
v.) No. 2:21-cv-00137-JDL
)
)
APPLE INC.,)
)
Defendant.)

Defendant's Motion for Enlargement

Defendant Apple Inc. seeks an enlargement of time to answer or otherwise respond to the complaint, from June 8, 2021, until July 12, 2021. As a basis for this motion, Apple states the following.

Plaintiff Primary Productions LLC filed its 55-page, 221-paragraph complaint on May 17, 2021. Following service, Apple's response is currently due on June 8, 2021. The complaint alleges eight claims for relief, including six different antitrust claims under the Sherman Act. Apple's lead counsel has been involved in other complex litigation on behalf of Apple, and needs additional time to prepare Apple's response to the complaint. When Apple's lead counsel contacted Plaintiff's counsel, seeking consent to this motion, Plaintiff's counsel stated that it would only agree to a 10-day enlargement, and then only on certain conditions. Given that Apple seeks only an initial 30-day enlargement to respond to an antitrust complaint, there is no basis for any such conditions.

Apple respectfully requests that its motion for enlargement of time to answer or otherwise respond to the Complaint until July 12, 2021, be granted.

Dated: June 3, 2021

Respectfully submitted,

/s/ Peter J. Brann
Peter J. Brann
pbrann@brannlaw.com
Stacy O. Stitham
sstitham@brannlaw.com
Brann & Isaacson
184 Main Street, 4th Floor
Lewiston, ME 04243-3070
(207) 786-3566

Attorneys for Defendant